

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, Washington 98101

JUL 2 0 2004

Reply to the Attention of M/S WCM-121

William L. Schmithorst Tacoma Site Manager Reichhold, Inc. P.O. Box 18532 Research Triangle Park, NC 27709

Re: C

Closure of RCRA Permitted Storage Unit 51

Reichhold Tacoma

EPA ID Number WAD 00925 2891

Dear Mr. Schmithorst:

The U.S. Environmental Protection Agency, Region 10 (EPA) has reviewed the Closure Report, Drum Storage Building - Unit 51, May 2004 (Closure Report) with the incorporated Independent Professional Engineer's Certification of Closure (Closure Certification), dated May 20, 2004. This document describes a partial closure of the facility under the facility's Resource Conservative and Recovery Act (RCRA) Permit.

This review of the Closure Report and Closure Certification has allowed EPA to conclude that closure of the storage unit (Unit 51) has been completed in accordance with the approved closure plan and associated closure conditions in the facility's RCRA permit which was issued December 4, 1988. In accordance with 40 C.F.R. §264.143(i), the facility is hereby released from the financial assurance requirements for closure which correlate specifically to the storage of wastes in Unit 51.

The Closure Report includes a statement that requires clarification. The second paragraph of the Introduction section of the Closure Report states: "... the only remaining RCRA activities at the Reichhold Tacoma Facility are associated with Corrective Action activities." This statement is not entirely accurate. Several land-based hazardous waste management units exist at the facility. Ongoing remediation and long-term management of these units is being overseen by the Washington State Department of Ecology (Ecology). Work at the facility will be conducted under a state-issued MTCA order which will be incorporated by reference into a dangerous waste permit. RCRA regulatory status and RCRA regulatory obligations remain for these units until such time as corrective action obligations under the permit have been fully met. This clarification does not affect the closure of Unit 51.

If you have any questions regarding this matter, please contact Robbie Hedeen at (206) 553-0201.

Sincerely

Office of Waste and Chemicals Management

cc: Stan Leja, Ecology Bill Sullivan, Puyallup Tribe of Indians